

**REMARKS**

Claims 1, 3-5, 7-9, 12-14 and 16-18 are pending in this application. By this Amendment, claims 1, 4, 5, 8, 12 -14, 16 and 17 are amended, and claims 2, 11 and 19-21 are cancelled without prejudice to or disclaimer of the subject matter contained therein. Reconsideration of the application is respectfully requested.

The courtesies extended to Applicants' representative by Examiner Thompson during the April 4 interview are appreciated. Applicants appreciate the courtesies shown to Applicants' representative by Examiner Thompson during the April 4 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks. Specifically, independent claims 1, 4, 8 and 14 are amended to comply with the Examiner's helpful suggestions made during the interview.

Entry of the amendments is proper under 37 CFR §1.116 since the amendments: (a) place the application in condition for allowance for the reasons discussed herein; (b) do not raise any new issue requiring further search and/or consideration since the amendments amplify issues previously discussed throughout prosecution; (c) do not present any additional claims without canceling a corresponding number of finally rejected claims; and (d) place the application in better form for appeal, should an appeal be necessary. The amendments are necessary and were not earlier presented because they are made in response to arguments raised in the final rejection. Entry of the amendments is thus respectfully requested.

The declaration is objected to for not identifying the mailing address, including Zip Code, of each inventor. Applicants submit that the declaration filed on December 26, 2001 includes the complete address for each of the inventors. Applicants reviewed, via PAIR, the declaration available in the Image File Wrapper of the Patent Office and believe that the Zip Code for inventor Norman W. Zeck is not shown due to improper scanning of the declaration.

For the convenience of the Examiner, Applicants attach hereto a copy of the declaration. It is respectfully requested that the objection to the declaration be withdrawn.

Claims 11 and 12 are rejected under 35 U.S.C. §112, second paragraph for depending from cancelled claim 10. The rejection of claim 11 is rendered moot by the cancellation of claim 11 and claim 12 is amended to depend from claim 8, responsive to the rejection. It is respectfully requested that the rejection be withdrawn.

Claim 1 is rejected under 35 U.S.C. §103(a) over the combination of U.S. Patent No. 5,729,632 issued to Tai and U.S. Patent No. 5,745,249 issued to Crean et al. (hereinafter "Crean") and claims 2, 4-5, 8, 11-14, 16, 17 and 19-21 are rejected under 35 U.S.C. §103(a) over Tai, in view of Crean and U.S. Patent No. 5,859,955 issued to Wang. The rejection of claims 2, 11 and 19-21 has been rendered moot by the cancellation of claims 2, 11 and 19-21. Further, in view of the amendments made to claim 1, and for completeness, in the following discussion, the features of claim 1 will be distinguished over the combination of Tai, Crean and Wang. The rejections of claims 1, 4-5, 8, 9, 12-14, 16 and 17 are respectfully traversed for at least the following reasons.

As discussed during the personal interview, neither Tai, Crean nor Wang discloses all features of amended independent claims 1, 4, 8 and 14 including, *inter alia*, a system or method that includes or selects from a plurality of Holladay counters including at least one stochastic counter and at least one clustered-dot counter, that includes or selects from a look up table that includes at least one clustered-dot halftone screen and at least one stochastic halftone screen, and processes the halftone image data based on the selected Holladay counter such that the received halftone image data is passed without processing or a portion of the halftone image data is replicated to produce replicated halftone image data.

More particularly, for example, page 7 of the Office Action states that col. 9, lines 7-13 of Tai discloses a digital logic circuit 160 that receives the halftone image data and passes

the halftone image data without changes, based on the selection indicator. However, the identified portion of Tai discloses a unified rendering controller 160 that renders raw or unrendered data, from the scanner into enhanced printable form for printing. Nowhere does Tai disclose that the unified rendering controller 160 receives the halftone image data and, based on the selected Holladay counter, determines whether the halftone image data is packed and if it determines that the halftone image data is not packed, passes the halftone image data without processing the halftone image data, and if it determines that the halftone image data is packed, selects at least a portion of the halftone image data and replicates the selected portion of the halftone image data to produce replicated halftone image data, as recited in independent claims 1, 8 and 14. Also, nowhere does Tai disclose that the unified rendering controller 160 replicates a portion of the produced halftone image data to produce replicated halftone image data when the stochastic counter is selected, as recited in independent claim 4.

Further, as discussed during the personal interview, Wang also fails to overcome the deficiencies of Tai and Crean because Wang, *inter alia*, also fails to disclose a digital logic circuit and/or processing step with all the features recited in amended claims 1, 4, 8 and 14.

For at least these reasons, Applicants submit that the combination of Tai, Crean, and Wang, fail to disclose or suggest all the features of claims 1, 4, 8 and 14, as well as all the features of claims 5, 9, 13, 13, 16 and 17, which depend therefrom. It is respectfully requested that the rejections be withdrawn.

Claim 3 is rejected under 35 U.S.C. §103(a) over the combination of Tai, Crean and U.S. Patent No. 5,410,414 issued to Curry. The rejection is respectfully traversed for at least the following reasons.

Applicants submit that Curry fails to overcome the deficiencies of the combination of Tai and Crean, as discussed above with regard to claim 1, from which claim 3 depends. For

at least these reasons, Applicants submit that the combination of Tai, Crean and Curry fails to suggest all the features of claim 3. It is respectfully requested that the rejection be withdrawn.

Claims 7, 9, and 18 are rejected under 35 U.S.C. §103(a) over Tai in view of Crean, Wang and Curry. The rejection is respectfully traversed for at least the following reasons.

Applicants submit that Curry fails to overcome the deficiencies of Tai, Crean and Wang, as discussed above with regard to claim 4, 8 and 14, from which claims 7, 9 and 18 respectively depend. For at least these reasons, Applicants submit that the combination of Tai, Crean, Wang and Curry fails to suggest all the features of claims 7, 9 and 18. It is respectfully requested that the rejection be withdrawn.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of all pending claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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JAO:MMI/ccs

Attachment:

Copy of December 26, 2001 Declaration

Date: April 6, 2005

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